

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Blake Lively,

Plaintiff,

V.

Wayfarer Studios LLC, a Delaware Limited Liability Company; Justin Baldoni, an individual; Steve Sarowitz, an individual; It Ends With Us Movie LLC, a California Limited Liability Company; Melissa Nathan, an individual; The Agency Group PR LLC, a Delaware Limited Liability Company; Jennifer Abel, an individual; Jed Wallace, an individual; and Street Relations, Inc., a California (sic) Corporation

Defendants.

Case No. 1:24-cv-10049-LJL
(Consolidated with 1:25-cv-00449-LJL)
NOTICE OF MOTION

Please take notice that, through the Memorandum of Law, Declaration of Jed Wallace dated March 18, 2025, Exhibits 1–6 attached, Jed Wallace (“Wallace”) and Street Relations, Inc. (“Street”) (collectively “Defendants”), by and through its undersigned counsel, will move this Court before the Honorable Lewis L. Liman at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing the claims of Blake Lively brought against them for the first time¹ in her Amended Complaint (Dkt. 84) (February 18, 2025) for (i) lack of personal jurisdiction, under Rule 12(b)(2); (ii) improper venue, under Rule 12(b)(3); (iii) failure to state a claim, under 12(b)(6); or (iv), in the alternative, Defendants move to sever the claims against them and to transfer venue to the United States District Court for

¹ Neither Wallace nor Street were sued in the original complaint. *See generally* Dkt. No. 1.

the Western District of Texas where a previously-filed case involving the same parties and allegations is pending and where Lively's claims could have been brought. *Jed Wallace and Street Relations, Inc. v. Blake Lively*, 1:25-cv-00163 (Dkt. No. 1) (W.D. Tex., February 4, 2025).

Dated: March 19, 2025

Respectfully submitted,

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S/ Charles L. Babcock

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